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**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN ALASKA
ENVIRONMENTAL CENTER, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
THE INTERIOR, *et al.*,

Defendants,

and

CONOCOPHILLIPS ALASKA,
INC.,

Intervenor-Defendant.

Case Nos. 3:19-cv-00055-SLG

JOINT STATUS REPORT AND MOTION TO STAY PROCEEDINGS

On May 29, 2020, the Court granted the parties' joint motion to stay this case until the Ninth Circuit issued its decision in the related case, *Northern Alaska Environmental Center et al. v. U.S. Department of the Interior et al.*, Case No. 19-35008 ("NAEC I"). This Court's order required parties to file a joint status report within thirty days after the Ninth Circuit issued its decision in NAEC I proposing either an extension of the stay, a new schedule for moving forward with the proceedings, or some other resolution of the present case. Order Granting Joint Motion to Stay Proceedings, *Northern Alaska Envtl. Ctr. v. U.S. Dep't of the Interior*, Case No. 3:19-cv-00055-SLG (April 2, 2019) (ECF 12). The Ninth Circuit issued its decision in NAEC I on July 9, 2020. Under Federal Rules of Appellate Procedure 40(a) and 35(c), Plaintiffs have forty-five days after entry of judgment in NAEC I to file a petition for panel rehearing or a petition for rehearing en banc. That deadline is August 24, 2020.

The parties in the above-captioned litigation respectfully submit this joint status report and motion for a further stay of proceedings. The parties ask the Court to stay proceedings in this case until the latter of the following: (1) August 24th, if Plaintiffs do not file a petition for panel or en banc rehearing with the Ninth Circuit Court of Appeals, or (2) if Plaintiffs file a petition for panel or en banc rehearing, the Ninth Circuit Court of Appeals makes a decision on whether to grant or deny the petition(s). Should this Court grant the parties' motion to stay, the parties would provide a joint status report thirty days after the stay is lifted proposing either an extension of the stay; a new schedule for filing

of the answer, lodging the administration record, and any briefing; or some other resolution of the present case. If the parties are unable to agree on language in the joint status report, they will submit separate statements in the same report.

Respectfully submitted August 7, 2020,

s/Suzanne Bostrom
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CERTIFICATE OF SERVICE

I certify that on August 7, 2020, I caused a copy of the JOINT STATUS REPORT AND MOTION TO STAY PROCEEDINGS to be electronically filed with the Clerk of the Court for the U.S. District Court of Alaska using the CM/ECF system.

s/Suzanne Bostrom
Suzanne Bostrom